

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 24-70 (JWB/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	MOTION FOR DISCOVERY
)	AND INSPECTION
)	
ASHLEY ANNE DYRDAHL,)	
)	
Defendant.)	

Defendant, Ashley Dyrdaahl, through her attorneys, Manny K. Atwal and Matthew Deates, respectfully moves the Court to order and requests the government *to continue* to disclose the following information; and the same make available for inspection, copying and photographing:

1. Any and all written or recorded statements made by the defendant or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.

2. That portion of any written record containing the substance of any relevant oral statement made by the defendant whether before or after arrest in response to interrogation by a known government agent.

3. Substance of any relevant oral statement made by the defendant whether before or after arrest in response to any interrogation by any person, known to the defendant to be a government agent if the government intends to use that statement at trial.

4. A copy of the prior criminal record of the defendant, if any, which is in the possession, custody or control of the government, the existence of which is known or by the exercise of due diligence may become known to the attorney for the government.

5. Any books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof which are within the possession, custody or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belonged to the defendant.

6. Any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof which are within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government, and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at trial.

7. A pretrial written summary of testimony the government intends to use pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial. This summary must describe the witnesses opinions, the bases and the reasons therefore, and the witnesses qualifications.

If prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection as herein requested, the government is requested to notify the attorney for the defendant about the existence of the additional material.

Dated: August 2, 2024

Respectfully submitted,

s/Manny K. Atwal

MANNY K. ATWAL

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